



**U.S. Department of Justice**

United States Attorney  
Southern District of New York

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 11, 2015

**BY HAND AND ECF**

Hon. Alison J. Nathan  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Cheng Le  
S1 15 Cr. 38 (AJN)**

Dear Judge Nathan:

In anticipation of trial in the above-captioned matter, which is slated to be on August 24, 2015, the parties have agreed upon the following short description of the case, to be read to the jury during *voir dire* before the jury is informed of the specific counts in the Indictment:

This case involves the defendant's alleged attempt to obtain lethal quantities of ricin, a biological toxin, for use as a weapon. In particular, the defendant is alleged to have tried to order ricin via an encrypted online marketplace from someone whom the defendant thought was a ricin trafficker but was, in fact, an undercover employee of the Federal Bureau of Investigation (that is, the "FBI"). The defendant is alleged to have used another individual's identity as part of his efforts to obtain the ricin, and to have used a false name in connection with a

mailing to further his criminal scheme. As a result of these allegations, the Indictment charges the defendant in three counts:

The parties respectfully suggest that the Court then proceed to an enumeration of the three counts in which the defendant is charged.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/ Ilan Graff  
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cc: Patrick Brackley, Esq. (by ECF)